

tacopina seigel trial lawyers

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FILED BY ECF

Hon. Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Carroll v. Trump, 22 Civ. 10016 (LAK) ("Carroll II")

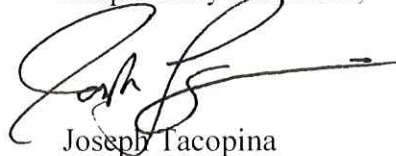
Your Honor:

We write to request permission to bring the following sound equipment into the courtroom for the purpose of potentially playing, outside the presence of the jury, audio/video recordings to witnesses during cross examination: (a) 1 soundboard; (b) 7 headphones; and (c) Accompanying cables.

If the need arises to (x) identify and authenticate audio/video evidence; (y) refresh the recollection of the witnesses with such evidence; (z) or impeach them with it (and the audio/video will be a recording of the witness speaking [in all three situations [x]-[z] above), we will ask to distribute headphones to the Court, counsel (2 headphones each side), witness, and the trial technician of opposing counsel, so that the audio/video can be played without the jury hearing it.

We thank the Court for its consideration.

Respectfully submitted,



Joseph Tacopina

cc: All counsel by ECF